

**Subject:** Re: Judge Bannon's Decision in Vahidi v. Azari, Index No. 655724/2019

**Date:** Monday, October 7, 2019 at 11:53:05 AM Eastern Daylight Time

**From:** Flick, Lawrence

**To:** Nader Mobargha

**CC:** Krezalek, Martin S., Michael Beys

We were not aware of this at all and I doubt Reza is aware of this action either. Did you attach the complaint and decision? If so I can't open on my phone.

Sent from my iPhone

On Oct 7, 2019, at 11:49 AM, Nader Mobargha <nmobargha@blmlp.com> wrote:

Larry and Martin,

Even assuming you were not involved in the Trust and Golsorkhi's latest attempt to avoid paying their undisputed obligations under Ms. Azari's Judgment, I attach the decision from Kamran Vahidi's latest frivolous lawsuit against Ms. Azari, which he filed last week. However, I am sure you are aware of it.

Not only did Judge Bannon deny Vahidi's TRO to delay the Sheriff sale, she "disposed" of his entire frivolous case, in which he alleges "collusion and fraud" between Golsorkhi and Ms. Azari.

We know that your clients were behind this because, back in November of last year, you informed us that, if we did not settle with the Trust even though we had won, the Trust would file an action in which they would allege "collusion" against Golsorkhi and Ms. Azari. And they did. Your clients were unfazed that the allegations in the first lawsuit, in which they claimed Golsorkhi did not understand English and that Ms. Azari "tricked" Golsorkhi, was entirely inconsistent with an allegation of "collusion", which implies the opposite, namely, that they worked together. This inconsistency was why your clients used Kamran as their shill.

As a result, you and your clients are on notice of three things:

1. The First Department's October 23, 2018 decision – and Judge Bannon's decision on Friday – confirm the validity of the judgment and are the law of the case.
2. These two decisions preclude **any** further attacks on the judgment – whether in state court, federal court, or Bankruptcy court. Any further challenges will be laughed out of court as Vahidi's lawyer was on Friday. It was not even close.
3. Should you or your clients decide to ignore the two points above and file another collateral attack, you are on notice that we will be seeking sanctions and attorney's fees against the law firm behind the attack and your clients, and will seek to hold your clients in contempt of court.

Nader

**Nader Mobargha**

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<655724\_2019\_KAMRAN\_ABBAS\_VAHID\_v\_AZADEH\_NASSER\_AZARI\_et\_al\_ORDER\_TO\_SHOW\_CAUSE\_32.pdf>

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